

REMARKS

Claims 1-12 are all the claims pending in the present application. The Examiner maintains the same rejections as set forth in the previous Office Action, and adds a few new arguments in the *Response to Arguments* section of the present Office Action. Specifically, claims 1-3 remain rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Takihara (U.S. Patent No. 6,941,387). Claims 4-12 remain rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Takihara in view of Iizuka et al (U.S. Patent No. 5,974,015).

§ 102(e) Rejections (Takihara) - Claims 1-3

Claims 1-3 are rejected over Takihara based on the reasons set forth on pages 2-4 of the present Office Action. Applicant traverses these rejections at least based on the following reasons.

With respect to independent claim 1, Applicant previously argued, in part, that the Examiner appears to pick and choose the different modules described in Takihara, and the elements thereof, as allegedly satisfying the claimed hard disk drive module and the elements set forth in claim 1. In response, the Examiner alleges:

Applicant's arguments filed September 29, 2006 have been fully considered but they are not persuasive. The Applicant argues that Takihara does not disclose or suggest at least, "wherein the main board is mounted on the modular television," as recited in claim 1 and that the Examiner believes that the PC module of Fig. 3 corresponds to the claimed hard disk module. The Examiner respectfully disagrees. The Examiner believes that the PC module of Fig. 3 corresponds to the main board represented as reference character "1" in Fig. 1 and that the hard disk module is reference character "2" in Fig. 1. Fig. 3 is a blown-up interpretation of the PC module (1) depicted in Fig. 1, which is what the Examiner is considering the main board. Therefore, with those interpretations Takihara meets the claim limitations.

In response, Applicant maintains the previous arguments, and submits that the Examiner's arguments above do not demonstrate that Takihara satisfies the claimed invention, as recited in claim 1. In fact, Applicant submits that the Examiner's argument actually supports Applicant's argument that Takihara does not anticipate claim 1. For instance, the Examiner acknowledges that he believes that the PC module 1 of Fig. 3 of Takihara corresponds to the claimed main board, and also acknowledges that he believes that the MPEG 1 video deck module corresponds to the claimed hard disk module. These acknowledgements contradict the specific language of claim 1. Claim 1 describes a hard disk module for a modular television that includes, *inter alia*: an interface portion for receiving and transmitting data from and to a main board; a memory; a recording and reproducing portion; and a control portion. As indicated above, the Examiner cited memories 122 and 123 of the MPEG 1 video deck module, which allegedly corresponds to the claimed hard disk module, and cites the 1394 I/F module (357) of the PC module 1 as allegedly satisfying the claimed interface portion. As indicated above, both an interface portion and the claimed memory constitute the hard disk module. Here, the Examiner has cited a component of the PC module, which allegedly corresponds to the claimed main board, and the memories of a separate component, the MPEG 1 video deck module, as satisfying the claimed memory of the hard disk module. However, claim 1 describes that the hard disk module comprises, *inter alia*, both a main board and memory. Therefore, clearly, the Examiner is picking and choosing indiscriminately to arrive at the present invention. That is, the Examiner has not shown at least in Takihara a claimed memory, a claimed interface portion, a claimed recording and reproducing portion, and a control portion, which all constitute a hard disk module. Therefore, since the specific features of claim 1 are not all satisfied by Takihara, Applicant submits that Takihara does not anticipate claim 1.

Further, Applicant maintains that Takihara does not disclose or suggest at least, “wherein the main board is mounted on the modular television,” as recited in claim 1. The Examiner believes that the PC module of Fig. 3 corresponds to the claimed hard disk module. However, nowhere does Takihara disclose or suggest that the PC module has a main board that is mounted on a modular television. The 1394 interface module 357 is only used to connect to other AV devices (e.g., an MPEG1 module; *see col. 8, line 64 - col. 9, line 6*), but nowhere is it disclosed or suggested that a main board is mounted on a modular television.

Further, Applicant submits that the “MPEG1 Video Deck module” of Takihara does not disclose or suggest any element corresponding to “a memory having a program stored therein for controlling the entire components connected to a bus disposed inside the hard disk module” as recited in claim 1.

Applicant submits that dependent claims 2 and 3 are patentable at least by virtue of their respective dependencies from independent claim 1.

§103(a) Rejections (Takihara / Iizuka) - Claims 4-12

With respect to independent claims 4 and 10, Applicant submits that these claims are patentable at least based on reasons similar to those set forth above with respect to claim 1. Iizuka does not make up for the deficiencies of Takihara.

Applicant submits that dependent claims 5 and 11 are patentable at least by virtue of their respective dependencies from independent claims 4 and 10.

Further, with respect to claim 5, Applicant previously argued that neither of the references, either alone or in combination, discloses or suggests that a hard disk is initialized by a control portion when the control portion receives the IRQ signal. Applicant maintains this argument as the Examiner does not respond to this particular argument in the Office Action.

RESPONSE UNDER 37 C.F.R. § 1.111
U.S. Application No.: 10/054,980

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With respect to independent claims 6, 9, and 12, Applicant submits that these claims are patentable based on reasons similar to those set forth above with respect to claim 4.

Applicant submits that claims 7 and 8 are patentable at least based on reasons similar to those set forth above with respect to claims 4 and 5.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Diallo T. Crenshaw
Registration No. 52,778

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

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